REMARKS

Claims 1-5, 23-27 45, 47-48, 50-51 and 53-59 are pending. Claims 1 and 23 have been amended. Claims 54-59 are new. No new matter has been added.

Claim rejections under 35 U.S.C. §102

Claims 1-5, 23-27, 45, 47-48, 50-51 and 53 stand rejected under 35 U.S.C. §102(e) as anticipated by Pang (US 6,578,188). Applicants respectfully traverse.

Independent claim 1 is directed to a method for inspecting a mask having a plurality of individual mask elements and recites the following limitations:

generating integrated circuit design data including priority information of each individual mask element; and

using at least the priority information for determining interfeature relationships between each individual mask element of the integrated circuit design data to inspect the mask.

Applicants respectfully submit that Pang does not disclose such limitations.

Pang is directed to a simulation server for mask defect printability analysis over a network to various client site including a mask house or a fabrication house that provides services to the client. The simulation server includes a network server having an interface that receives a mask image from the client. The mask image represents a single potential defect or multiple potential defects on the mask. The interface transfers the mask image to a module in the network server. The module stores the mask image in a database. The network simulation server allows a client to consult engineers, and multiple users can view the same mask defect image and provide comments to each other as simulation and analysis are performed on the defect image. *See Pang, col. 4, line 66 to col. 6, line 11.*

Importantly, with respect to inspection, Pang discloses, in FIG. 4, a process of inspecting a mask for defects. A defect detection processor 440 compares mask images provided by a image acquiror 430 to a set of potential defect criteria and determines what areas of the mask contain potential defects. The processor 440 also controls a defect area image generator 442 which provides images of those areas of the mask 420 which may contain defects. *See Pang, col. 8, line 27 to col. 9, line 30.* Even though Pang discloses comparing mask images to potential defect criteria, Pang fails to disclose each and every limitation of Applicants' present claims.

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In contrast to Pang, independent claim 1, as amended, requires generating integrated circuit design data including priority information of each individual mask element and using at least the priority information for determining interfeature relationships between each individual mask element of the integrated circuit design data to inspect the mask.

Pang does not disclose these limitations of amended independent claim 1.

For at least these reasons, it is respectfully submitted that independent claim 1, as amended, is not anticipated by the cited Pang reference.

For at least these same reasons, it is respectfully submitted that independent claim 23, as amended, and new independent claim 59 are likewise not anticipated by the cited Pang reference.

Since claims 2-5, 24-27, 45, 47-48, 50-51 and 53 depend from independent claims 1 and 23, respectively, these dependent claims are also not anticipated and are therefore allowable over the cited Pang reference.

New claims 54-58 depend from independent claim 1 and are allowable for at least their dependence on independent claim 1.
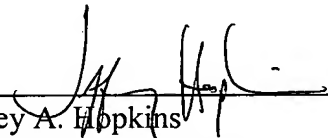
Conclusion

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-2518,** referencing billing number **7010502001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-2518,** referencing billing number **7010502001**.

Respectfully submitted,

Bingham McCutchen LLP

Date: June 26, 2006

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